

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA  
Plaintiff,

v.

JORGE CARRASQUILLO-ROSARIO  
Defendant.

Criminal no. 17-232 (ADC)

**MOTION TO MODIFY CONDITIONS OF PRE-TRAIL RELEASE**

**TO THE HONORABLE COURT:**

Comes now the defendant, Mr. Carrasquillo-Rosario, and respectfully states and prays as follows:

1. On April 7, 2016, Mr. Carrasquillo was granted bail and was subsequently released pending trial on the conditions that he abides by the conditions imposed by the U. S Probation Office.

2. As informed during his detention hearing, and verified by the Pre-trial service office, Mr. Carrasquillo is employed as a taxi driver. In said capacity, he takes his passengers to various destinations within the jurisdiction, including the Luis Muñoz Marín International Airport.

3. Condition number 7(f) of the Additional Conditions of Release state that Mr. Carrasquillo “[s]hall not enter any airport or pier, unless authorized by PT Officer.” See docket #9.

4. Although Mr. Carrasquillo is not technically entering any physical building nor needs to enter any building when dropping off passengers at the Luis Muñoz Marín International Airport, out of an abundance of caution, it is requested that the court allows Mr. Carrasquillo access to the airport’s main road to perform his work duties.

5. Before filing said motion, counsel spoke with Mr. Carrasquillo's assigned pre-trial probation officer, Mrs. Katherine Valentín, who informed that she has no objection to the current motion.

**WHEREFORE**, it is respectfully requested that this Honorable Court to take note of this Motion to Modify and authorizes Mr. Carrasquillo to drop-off passengers at the Luis Muñoz Marín International Airport.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22<sup>nd</sup> day of June 2017.

**I HEREBY CERTIFY**, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

s/ Diego H. Alcalá Laboy  
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